

**UNITED STATES DISTRICT COURT
DISTRICT OF WASHINGTON - WESTERN**

MICHAEL D. GOON,

Case No.: 2:18-cv-01445-JLR

Plaintiff,

PLAINTIFF'S FRCP 26(A)(3) DISCLOSURES

VS.

MICHAEL COLEMAN, et al.;

Defendants.

Plaintiff **MICHAEL D. GOON**, through counsel Adam P. Karp, provides his FRCP 26(a)(3) disclosures below.

Mr. Goon reserves the right to call any of the following witnesses, as well as others for impeachment or rebuttal not identified herein.

FRCP 26(a)(3)(A)(i) Witness Disclosures

1. **Michael D. Goon.** c/o Adam P. Karp, Esq. [Expected]
 2. **Michael Coleman.** c/o Chris M. Clay, Esq. [Expected]
 3. **Christopher Linville.** 27319 220th Pl. SE, Maple Valley, WA. [As need arises]
 4. **Holden Wilkinson.** c/o Chris M. Clay, Esq. [Expected]
 5. **Jme Thomas with Motley Zoo Animal Rescue.** 23316 NE Redmond-Fall City Rd. #522, Redmond, WA 98053, (206) 453-8480. [Expected]

**PLAINTIFF'S FRCP 26(A)(3)
DISCLOSURES (18-CV-01445-JLR) - 1**

ANIMAL LAW OFFICES OF
ADAM P. KARP, ESQ.

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1 6. **Rhegan Taylor.** c/o Adam P. Karp, Esq. [As need arises]
2 7. **Leanne Taylor.** c/o Adam P. Karp, Esq. [Expected]

3 8. **Robbert Leigh Taylor.** 22006 126th St. E., Bonney Lake, WA 98391, 253-257-6671.

4 [Expected]

5 9. **Dep. Greg R. Victor and other officers involved in C17058502.** King County Sheriff's
6 Office, 516 3rd Ave. Rm W116, Seattle, WA 98104, 206-296-3311. [As need arises]

7 10. **Bruce L. Lemon.** Risk Mitigation Administrator of DOC, 818 – 79th Ave., Ste. C-1,
8 Olympia, WA 98501, 360-725-8301. [As need arises]

9 11. **Jennifer G. Ward, DVM, DACVP** of Specialty VetPath, 3450 16th Ave. W., Ste. 303,
10 Seattle, WA 98119, (206) 453-5691. [Expected]

11 12. **Keith Tate, DVM** at Wilderness Animal Hospital. 23714 222nd Pl. SE, Ste. L, Maple
12 Valley, WA 98038, (425) 432-9975. [As need arises]

13 13. **James Crosby, MS, CBCC-KA.** Canine Aggression Consulting LLC, 1435 Oak Haven
14 Rd., Jacksonville, FL 32207, (904) 476-7655. [Expected]

15 14. **Hilary Hager, MNPL.** 10200 64th Pl. W., Mukilteo, WA 98275, (425) 308-6140.
16 [Expected]

17 15. **Donta Harper.** c/o Chris M. Clay, Esq. [As need arises]

18 16. **David Dunscombe.** c/o Chris M. Clay, Esq. (CCO – Reynolds Work Release). [As need
19 arises]

20 21. **Any individuals necessary to authenticate cloning, veterinary medical, or other
records or exhibits offered herein.** [As need arises]

22 23 **FRCP 26(a)(3)(A)(ii) Deposition Testimony:**

24 25 Mr. Goon may use parts of the depositions of Michael Coleman, Holden Wilkinson, Tomas
Fithian, and Donta Harper at trial as substantive evidence or for impeachment/rebuttal, at Mr.

PLAINTIFF'S FRCP 26(A)(3)
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1 Goon's election.

2

FRCP 26(a)(3)(A)(iii) Exhibits:

3 Mr. Goon identifies the following exhibits for presentation at trial. This list may not include
4 all potential impeachment exhibits, including, *inter alia*, discovery responses, prior statements,
5 and deposition excerpts. Mr. Goon reserves the right to use any exhibits identified by the
6 Defendants (provided same are not otherwise barred by rule or statute and not objected to by Mr.
7 Goon).

Exh. #	Exhibit Description
1	Video footage (AVI or MP4 format) – Camera 1 ¹
2	Video footage (AVI or MP4 format) – Camera 2 ²
3	Wilderness Animal Hospital Invoice 216598
4	12.6.17 letter of Keith Tate, DVM
5	Necropsy Report: Amended of Jennifer G. Ward, DVM, DACVP ³
6	Figure 1 to Necropsy Report: Amended ⁴
7	Figure 2 to Necropsy Report: Amended ⁵
8	Specialty VetPath Invoice INV-000358 ⁶
9	Radiograph 1 ⁷
10	Radiograph 2 ⁸
11	Radiograph 3 ⁹
12	Value Pet Invoice 193916
13	Photograph to Viagen
14	Viagen Invoice INV0000011404
15	Viagen Invoice 5410
16	Viagen Invoice 7802
17	1.23.18 Viagen letter to Goon
18	Viagen Genetic Preservation Cell Storage Agreement

19

20

¹https://drive.google.com/file/d/1mBlWQc0heUTFHGRG2xX_d3U8s0x1ouX0/view?usp=sharing;
https://drive.google.com/file/d/1ywf0pxr2UMhNo9_GeUHNfxyAHS3_LNHv/view?usp=sharing;

²<https://drive.google.com/file/d/1HKNh-Flfq8ufN2dbwfLjb31uWx67tJR3/view?usp=sharing>;
<https://drive.google.com/file/d/1zq5ASMQnOaVXqOm6AEbYHbBaDlhDg3Yc/view?usp=sharing>;

³ Dkt. 42, pages 9-10.

⁴ Dkt. 42, page 11.

⁵ Dkt. 42, page 12.

⁶ Dkt. 42, page 13.

⁷ Dkt. 42, pages 6.

⁸ Dkt. 42, pages 7.

⁹ Dkt. 42, pages 8.

1	19	Offender Release Plan File, including Chronos ¹⁰
2	20	OMNI Rodarte with Chronos ¹¹
3	21	State of Washington DOC Policy 410.920 ¹²
4	22	State of Washington DOC Policy 410.930 ¹³
5	23	State of Washington DOC Policy 410.215 ¹⁴
6	24	Police Event History K17396195 ¹⁵
7	25	KCSO Incident Report No. C17028425 ¹⁶
8	26	Photograph of Shiloh deceased
9	27	Photograph of dislodged gate
10	28	Closeup photograph of casing near dislodged gate
11	29	Coleman business card ¹⁷
12	30	Coleman training jacket ¹⁸
13	31	Coleman second training jacket ¹⁹
14	32	Coleman UOF Reports – Linville ²⁰
15	33	Wilkinson UOF Reports - Linville ²¹
16	34	Coleman UOF Reports – Goon
17	35	Wilkinson OMNI Entry
18	36	Photograph of property ²²
19	37	Photograph of bullet in riser (farthest)
20	38	Photograph of bullet in riser (closer)
21	39	Photograph of bullet in riser (closer still)
22	40	Photograph of bullet in riser (closest)
23	41	Photograph of front of Coleman ²³
24	42	Photograph of back of Coleman
25	43	Photograph of front of Wilkinson ²⁴
26	44	Photograph of back of Wilkinson
27	45	Wilkinson training jacket ²⁵
28	46	The Problem of Dog-Related Incidents and Encounters (USDOJ/COPS) ²⁶
29	47	Area Deputies Train in Dog Handling After Recent Shooting Cases (Bradenton

¹⁰ Pages 1-4 are found at Dkt. 40, pages 5-8; see also Goon v. DOC 04050001-15.

¹¹ Goon v. DOC 04260001-19

¹² Dkt. 43, pages 71-84.

¹³ Goon v. DOC 07030001-08

¹⁴ Goon v. DOC 07040001-0005

¹⁵ Goon v. DOC 05010001-02

¹⁶ Goon v. DOC 05010003-05

¹⁷ Dkt. 40, page 3:9-13; Coleman Dep. Exh. 4.

¹⁸ Dkt. 43, pages 48-50.

¹⁹ Dkt. 43, pages 52-56.

²⁰ Goon v. DOC 04120077-78, 04120082-86, 04120111-113.

²¹ Id.

²² Coleman Dep. Exh. 7.

²³ Coleman Dep. Exh. 11. Note that the scanned exhibit from the court reporter appears to truncate page 2.

²⁴ Coleman Dep. Exh. 12.

²⁵ Wilkinson Dep. Exh. 13.

²⁶ Dkt. 28, pages 39-90.

**PLAINTIFF'S FRCP 26(A)(3)
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	Patch) ²⁷
1	48 Dog Shooting Leads to Police Reform (St. Pete's Patch) ²⁸
2	49 Gulfport Police Get "Aggressive Dog" Training (WLOX 13) ²⁹
3	50 Law Enforcement Dog Encounter Training course and manual approved by National Sheriffs' Association ³⁰
4	51 Evaluation of Pepper Spray (NIJ 1997) ³¹
5	52 Use of Force-Tactics Directive (LAPD 2009) ³²
6	53 Photograph with markup (Crosby Exh. P1 - drone/Goon) ³³
7	54 Photograph with markup (Crosby Exh. P2 – steps) ³⁴
8	55 Photograph of still from Camera 2 (Crosby Exh. P3) ³⁵
9	56 Photograph with markup (Crosby Exh. P4 – steps/closeup) ³⁶
10	57 Photograph of Coleman Dep. Exh. 8 (Crosby Exh. P5) ³⁷
11	58 Photograph of Goon property with re-set fence and orange tape ³⁸
12	59 Photograph of Rhegan Taylor and Shiloh ³⁹
13	60 Photograph of Goon and Shiloh ⁴⁰
14	61 Photograph of Shiloh being hugged ⁴¹
15	62 Photograph of Shiloh swimming ⁴²
16	63 Photograph of Shiloh and infant ⁴³
17	64 Photograph of Shiloh being carried ⁴⁴
18	65 Photograph of Shiloh in canyon ⁴⁵
19	66 Photograph of Shiloh in sweater ⁴⁶
20	67 Photograph of Shilo on trail
21	68 Photograph of Shilo swimming
22	69 Photograph of Shiloh in rapids
23	70 Photograph of Shiloh closeup

²⁷ Dkt. 28, page 91.

²⁸ Dkt. 28, pages 92-93.

²⁹ Dkt. 28, page 94.

³⁰ Previously sent to Defendants as Exh. D to Crosby Declaration. Manual:

https://drive.google.com/open?id=1Gd4gZepKCu_QKpotoCjwGtgB990MSAzS; Course:

https://drive.google.com/open?id=1IPKAPqLJ_kp-TjwGgOJ2q4h2ZbjByuWt

³¹ Dkt. 28, pages 95-102.

³² Dkt. 28, pages 103-106.

³³ Dkt. 28, page 107.

³⁴ Dkt. 28, page 108.

³⁵ Dkt. 28, page 109.

³⁶ Dkt. 28, page 110.

³⁷ Dkt. 28, page 111.

³⁸ Dkt. 39, page 3:1-13.

³⁹ Dkt. 39, page 3:19-25.

⁴⁰ Dkt. 39, page 4:3-10.

⁴¹ Dkt. 39, page 4:19-24.

⁴² Dkt. 39, page 5:9-16.

⁴³ Dkt. 39, page 5:17-24.

⁴⁴ Dkt. 39, page 6:1-7.

⁴⁵ Dkt. 39, page 6:17-23.

⁴⁶ Dkt. 39, page 7:3-7.

**PLAINTIFF'S FRCP 26(A)(3)
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1	71	Photograph of Shiloh carrying rock
2	72	Photograph of Shiloh with Goon sleeping in vehicle
3	73	Photograph of Shiloh on dock
4	74	Photograph of shrine
5	75	Photograph of Shiloh as puppy
6	76	Photograph of Shiloh as puppy
7	77	Photograph of Shiloh as puppy (left) ⁴⁷
8	78	MZAR's website bio for Shiloh ⁴⁸

5 Submitted this January 17, 2020
 6

7 ANIMAL LAW OFFICES
 8 
 9

10 Adam P. Karp, WSB No. 28622
 11 Attorney for Plaintiff

12 **CERTIFICATE OF SERVICE**

13 The foregoing was served on the following person in the following manner:

14 **Via ECF (1.17.20):**

15 Christopher Clay
 16 Assistant Attorney General
 17 Washington State Attorney General's Office
 18 PO Box 40126
 19 Olympia, WA 98504-0126
 20 Chris.clay@atg.wa.gov
Debbie.thomas@atg.wa.gov
Kathy.lake@atg.wa.gov
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24 Adam P. Karp, WSBA No. 28622

25 ⁴⁷ Dkt. 41, page 3:13-22.

⁴⁸ Dkt. 41, page 2:10-25.

**PLAINTIFF'S FRCP 26(A)(3)
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